

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re: Chapter 11

Aberdeen Enterprises, Inc., Case No. 23-72834-AST

Debtor.

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In re: Chapter 11

Brickchurch Enterprises, Inc., Case No. 22-70914-AST

Debtor.

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**APPLICATION FOR ORDER DIRECTING JOINT ADMINISTRATION  
PURSUANT TO BANKRUPTCY RULE 1015(b)**

**TO THE HONORABLE ALAN S. TRUST,  
UNITED STATES BANKRUPTCY JUDGE:**

Aberdeen Enterprises, Inc. (“Aberdeen”) and Brickchurch Enterprises, Inc. (“Brickchurch”) (each a “Debtor”, and collectively, the “Debtors”) as and for their joint application respectfully represent:

1. On April 30, 2022, Brickchurch originally filed a voluntary Chapter 11 petition and has continued as a debtor in possession. Subsequently, Aberdeen filed a separate voluntary petition on August 2, 2023 and likewise continues as a debtor in possession.

2. The Debtors are affiliates, each owning one of the two contiguous ocean front properties located at 366 and 376 Gin Lane, Southampton, New York with significant cross collateralized mortgage debt. The beneficial equity holder of each of the Debtors is Louise Blouin. Accordingly, the Debtors are affiliates, as that term is defined in 11 U.S.C. 101(2).

3. Bankruptcy Rule 1015(b)(4) authorizes the entry of an order for the joint administration of cases under Title 11 involving a debtor and an affiliate of the debtor.

4. Given the substantial cross collateralized secured debt, plus the fact that the IRS has filed corresponding federal tax liens against both debtors, joint administration of these Chapter 11 case is appropriate and will obviate the need for duplicative notices, applications and orders, thereby saving unnecessary time and expense. Indeed, the Debtors are in the process of preparing a joint plan to be submitted early next week.

5. In view of the foregoing, the administrative concerns of both of the Debtors, their creditors and equity holders would best be served by joint administration of the cases.

WHEREFORE, Aberdeen and Brickchurch seek the entry of the prefixed order, pursuant to Bankruptcy Rule 1015(b), directing the joint administration of the affiliated cases, and for such other and further relief as it is just and proper.

Dated: New York, NY  
September 1, 2023

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By: /s/ Kevin J. Nash, Esq.